

1 Daniel Johnson Jr. (No. 57409)
Mario Moore (No. 231644)
2 Robert G. Litts (No. 205984)
DAN JOHNSON LAW GROUP, LLP
3 400 Oyster Point Blvd., Suite 321
South San Francisco, CA 94080
4 Telephone: (415) 604-4500
Facsimile: (415) 604-4438
5 dan@danjohnsonlawgroup.com
mario@danjohnsonlawgroup.com
6 robert@danjohnsonlawgroup.com

7 Sean P. DeBruine (No. 168071)
1259 El Camino Real, Suite 406
8 Menlo Park, CA 94025
Telephone: (650) 269-9140
9 Facsimile: (650) 485-2584
sean@debruinelaw.com

10 Attorneys for Plaintiff
11 IPSILIUM LLC

12 Sarah E. Piepmeier (SBN 227094)
Sarah A. Piazza (SBN 293626)
13 Elise S. Edlin (SBN 293756)
Andrew T. Ohlert (SBN 306443)
14 KIRKLAND & ELLIS LLP
555 California Street
15 San Francisco, CA 94104
Telephone: (415) 439-1400
16 Facsimile: (415) 439-1500
sarah.piepmeier@kirkland.com
17 sarah.piazza@kirkland.com
elise.edlin@kirkland.com
18 andrew.ohlert@kirkland.com

19 Attorneys for Defendant
CISCO SYSTEMS, INC.

21 **IN THE UNITED STATES DISTRICT COURT**
22 **FOR THE NORTHERN DISTRICT OF CALIFORNIA**
23 **OAKLAND DIVISION**

23 IPSILIUM LLC,

24 Plaintiff,

25 v.

26 CISCO SYSTEMS, INC.,

27 Defendant.
28

Case No. 4:17-cv-07179-HSG

STIPULATION AND ~~PROPOSED~~
ORDER DISMISSING CLAIMS AND
COUNTERCLAIMS

1 Pursuant to Fed. R. Civ. P. 41 and Civ L.R. 7-12, Plaintiff Ipsilium LLC ("Ipsilium") and
2 Defendant Cisco Systems, Inc. ("Cisco") (collectively, "the Parties") hereby jointly stipulate and
3 agree as follows, subject to the approval of the Court, to dismiss their claims and counterclaims
4 against each other:

5 WHEREAS, the Parties have agreed to resolve this action pursuant to a confidential
6 Settlement Agreement; and

7 WHEREAS, Ipsilium desires to dismiss the causes of action stated in its First Amended
8 Complaint (Dkt. No. 15) with prejudice; and

9 WHEREAS, Cisco consents to the dismissal with prejudice of Ipsilium's First Amended
10 Complaint and agrees to dismiss its counterclaims raised in its Amended Answer to Ipsilium
11 LLC's First Amended Complaint, Affirmative Defenses and Counterclaims (Dkt. No. 30);

12 WHEREAS, Ipsilium consents to the dismissal of Cisco's counterclaims;

13 NOW, THEREFORE, the parties hereby stipulate and request the Court to Order that the
14 causes of action stated in Ipsilium's First Amended Complaint be dismissed with prejudice and
15 that Cisco's counterclaims stated in its Answer to First Amended Complaint and Counterclaims be
16 dismissed with prejudice.

17 DATED: June 27, 2019

By /s/ Sean P. DeBruine
Sean P. DeBruine (No. 168071)


19 Attorney for Plaintiff
20 IPSILIUM, LLC

21 By /s/ Sarah E. Piepmeier
Sarah E. Piepmeier (No. 227094)

22 Attorney for Defendant
23 CISCO SYSTEMS, INC.

24 PURSUANT TO STIPULATION, IT IS SO ORDERED.

25
26 DATED: 6/28/2019


Hon. Haywood S. Gilliam, Jr.
United States District Judge